

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LOUIS YUDKOVITZ,	:	
	:	
Plaintiff,	:	Case No. 02-CV-3029
	:	
v.	:	
	:	
BELL ATLANTIC COPORATION, BELL	:	JUDGE LEGROME D. DAVIS
ATLANTIC NETWORK SERVICES, INC.,	:	
VERIZON COMMUNICATIONS INC. and	:	
VERIZON SERVICES CORP.	:	
	:	
Defendants.	:	

**MOTION TO COMPLETE PLAINTIFF'S DEPOSITION
FOLLOWING THE CLOSE OF DISCOVERY**

The parties to the above-referenced case jointly petition the Court for permission to conclude Plaintiff's deposition on February 17, 2003, which is three days following the Court-ordered close of discovery, and state as follows in support thereof:

1. The Court on or about November 21, 2002, ordered that factual discovery in the above-captioned case conclude on or before Friday, February 14, 2003.
2. Defendants convened Plaintiff's deposition on or about Thursday, January 16, 2003, but did not complete their questioning of Plaintiff.
3. The earliest mutually agreeable date available to complete Plaintiff's deposition is Monday, February 17, 2003, which is the first business day following the close of discovery.
4. The parties anticipate that completion of Plaintiff's deposition on this date will not delay the filing of dispositive motions on or before the Court-ordered date of March 14, 2003, nor do the parties foresee it causing any other delays.

WHEREFORE, the parties in the above-referenced case request that the Court grant them permission to complete Plaintiff's deposition on February 17, 2003.

Respectfully submitted,

/s/

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/s/

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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on this 4th day of February 2003, a true and correct copy of the foregoing **Motion to Complete Plaintiff's Deposition Following the Close of Discovery** was served via first class mail, postage prepaid, upon the following:

James S. Urban
JONES DAY
500 Grant Street
Suite 3100
Pittsburgh, PA 15219

Dated: February 4, 2003 _____ /s/

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Plaintiff,	:	Case No. 02-CV-3029
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VERIZON COMMUNICATIONS INC. and	:	
VERIZON SERVICES CORP.	:	
	:	
Defendants.	:	

ORDER OF COURT

AND NOW, upon consideration of the parties' joint Motion to Complete Plaintiff's Deposition Following the Close of Discovery, it is hereby ORDERED that said Motion is GRANTED. The parties may complete Plaintiff's deposition on February 17, 2003.

BY THE COURT:

Davis, J.